

Fair Processing Notice for Trade Customers

At RTR Services, we respect your personal data. This Privacy Notice explains how we will use your personal data when you are a trade customer.

Our contact details

dormakaba t/a RTR Services

Unit 14b Wakes Hall Business Centre, Colchester Road,
Wakes Colne,
Colchester Essex,
CO6 2DY

Our UK Data Protection Officer can be contacted by emailing
gdpr.GB@dormakaba.com

1. What personal data do we collect about you? How will we use that personal data? What is our legal basis for processing your data?

Online purchases

In order for you to make a purchase, we need your name, address, and your email address or mobile number. Our legal basis for processing this information is contract – we need your details in order to send you your goods.

We take your card details through our secure payment provider in order for you to pay for your goods. This processing is also done because we have a contract with you.

Company Accounts

If you are applying for a line of credit and an account, we will need your:

- company name
- trading name
- company registration number

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- VAT number
- Accounts address
- Accounts contact
- email addresses

The only personal data in the list is the name of the accounts contact. We will use that information to contact the named individual and this is a legitimate interest.

We use Credit Assist for our credit reference checks. Please click [here](#) for the link to their privacy notice.

2. Marketing

We will send you marketing purchased a product or have an abandoned cart. Our legal basis for doing so is legitimate interest.

You can also choose to receive marketing from us by signing up to receive it with your email address.

If you unsubscribe from any emails, we will keep your email address in a suppression list for five years so that we don't email you again by accident. This is a legitimate interest for us.

We also send business to businesses marketing emails and this is a legitimate interest.

3. Do we use any automated decision making?

We do not use any automated decision making.

4. Who do we share your personal data with?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Entity				Legal basis for sharing	
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Our professional advisers such as lawyers and accountants	Legitimate interest
Government or regulatory authorities or law enforcement	Legal obligation
Professional indemnity or other relevant insurers	Legitimate interest
Third parties to whom we outsource certain services such as, without limitation, confidential waste disposal, IT systems or software providers, IT support service providers, document and information storage providers	Legitimate interest

Whenever we share your personal information, we will do so in line with our obligations to keep your information safe and secure.

Please note this list is non-exhaustive and there may be other examples where we need to share with other parties in order to provide our services as effectively as we can.

We conduct an appropriate level of due diligence and put in place contractual documentation in relation to any sub-contractor to ensure that they process personal data appropriately and according to our legal and regulatory obligations.

5. Do we transfer your personal data outside of the UK?

Yes via Mail Chimp, a third party marketing platform in the USA. The USA is a non-adequate country for data transfers. We use the UK's International Data Transfer Agreement as the transfer safeguard.

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6. How long do we keep your personal data for?

We will hold your data for seven years for HMRC purposes, if you have purchased an item from us.

We will keep your email in our marketing database until you unsubscribe or haven't opened an email from us for one year. Then we will move your email to our suppression database.

7. How we protect your information

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal data which is collected, recorded, or processed in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection responsibilities.

Your data is protected by controls designed to minimise loss or damage through accident, negligence, or deliberate actions. Our employees are trained to protect sensitive or confidential information when storing or transmitting data in any medium including electronically and must undertake annual refresher exercises on this.

8. How to access your information and your other rights

You have the following rights in relation to the personal data we hold about you:

- **Your right of access**
If you ask us, we'll confirm whether we're processing your personal data and, if necessary, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.
- **Your right to rectification**
If the personal data we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified. If you are entitled to rectification and if we've shared your personal data with others, we'll let them know about the rectification where possible. If you ask us,

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where possible and lawful to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.

- **Your right to erasure**

You can ask us to delete or remove your personal data in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and if we've shared your personal data with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.

- **Your right to restrict processing**

You can ask us to 'block' or suppress the processing of your personal data in certain circumstances, such as where you contest the accuracy of that personal data or you object to us. If you are entitled to restriction and if we've shared your personal data with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal data with so that you can contact them directly.

- **Your right to data portability**

You have the right, in certain circumstances, to obtain personal data you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

- **Your right to object**

You can ask us to stop processing your personal data, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or
- processing your personal data for direct marketing purposes.

- **Your right to withdraw consent**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time.

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- **Your right to lodge a complaint with the Information Commissioner's Office**

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal data, you can report it to the ICO. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Please note that some of these rights may be limited where we have an overriding interest or legal obligation to continue to process the data or where data may be exempt from disclosure due.

The ICO can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

Fax: 01625 524510

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Updates to policy:

Review Date	Changes or Modifications	Approved by	Published

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